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Attorneys for Defendant,  
THE PERMANENTE MEDICAL GROUP, INC.

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA – SACRAMENTO DIVISION

JULIE AMORUSO,

Plaintiff,

v.

THE PERMANENTE MEDICAL GROUP, a  
California corporation; and KAISER  
FOUNDATION HOSPITALS, a California  
corporation, collectively dba KAISER  
PERMANENTE SOUTH SACRAMENTO  
MEDICAL CENTER, KAISER PERMANENTE  
ROSEVILLE MEDICAL CENTER and  
KAISER PERMANENTE STOCKTON  
FACILITY,

Defendants.

Case No. 2:20-CV-01335-KJM-DB

**JOINT STIPULATION AND FURTHER  
REQUEST FOR CONTINUANCE OF  
PRETRIAL DEADLINES AND  
ORDER**

Complaint Filed: July 6, 2020  
Trial Date: TBD

Counsel for Plaintiff JULIE AMORUSO (“Plaintiff”) and Defendant THE  
PERMANENTE MEDICAL GROUP, INC. (“Defendant”), (collectively referred to as the

“Parties”), hereby enter into the following Joint Stipulation and request the Court to extend certain pretrial deadlines, pursuant to applicable Local Rules. These are the only two Parties to this Action.

1. This is an Action for alleged violation of Title VII of the Civil Rights Act of 1964 and the California Fair Employment and Housing Act, for Failure or Refusal to Hire on Basis of Religion; Failure to Provide Religious Accommodation; and Disparate Impact on the Basis of Religion. The Parties have engaged in extensive written discovery and completed several depositions, but both sides agree further discovery is still necessary. The parties seek a continue of pretrial deadlines of approximately three months. No trial date has been set at this time.

2. Good cause exists to continue the pretrial deadlines because the Parties have been unable to complete all necessary discovery, including several more depositions. The parties need the discovery to prepare for any trial and to properly evaluate whether they desire to engage in informal resolution discussions and a possible mediation. Defendant and its employees, as healthcare providers, have been particularly impacted by the COVID-19 pandemic, which has slowed the discovery process, including the collection and production of requested data. Requested data has recently been produced and several depositions have recently occurred; but the recent discovery has highlighted the need for further discovery by both parties which cannot be completed by the existing deadlines. Both sides also have some upcoming unavailability of individuals necessary to complete the discovery. Further, a witness to be deposed by Plaintiff is also on a leave of absence and is expected to be out until at least the end of May. The parties are working cooperatively with one another to get the discovery completed and exchange all relevant information. Because no trial date has been set in this matter, no prejudice will be suffered by the Parties and the Court’s docket will not be adversely impacted by granting this request.

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3. The Parties hereby jointly request the Court modify the scheduling order as follows:

<b><u>CATEGORY</u></b>	<b><u>PRIOR DEADLINE</u></b>	<b><u>PROPOSED DEADLINE</u></b>
Fact Discovery Cut-Off	April 28, 2022	July 28, 2022
Expert Disclosures	April 21, 2022	July 21, 2022
Rebuttal Expert Witnesses Exchange	May 16, 2022	August 22, 2022
Expert Discovery Cut-Off	June 30, 2022	September 22, 2022
Dispositive Motions	July 29, 2022	October 31, 2022

It is so AGREED.

Date: April 11, 2022

PACIFIC JUSTICE INSTITUTE

By: /s/ Kevin T. Snider (Auth. 04/11/2022)  
KEVIN T. SNIDER  
MATTHEW B. MCREYNOLDS

Attorneys for Plaintiff  
JULIE AMORUSO

Date: April 13, 2022

JACKSON LEWIS P.C.

By: \_\_\_\_\_  
MICHAEL J. CHRISTIAN  
SHANE R. LARSEN

Attorneys for Defendant  
THE PERMANENTE MEDICAL GROUP,  
INC.

**ORDER**

The Court, having considered the foregoing stipulation of the parties, and good cause appearing therefor, makes the following order:

IT IS ORDERED THAT THE PRETRIAL DEADLINES ARE CONTINUED AS FOLLOW:

<b><u>CATEGORY</u></b>	<b><u>PRIOR DEADLINE</u></b>	<b><u>NEW DEADLINE</u></b>
Fact Discovery Cut-Off	April 28, 2022	July 28, 2022
Expert Disclosures	April 21, 2022	July 21, 2022
Rebuttal Expert Witnesses Exchange	May 16, 2022	August 22, 2022
Expert Discovery Cut-Off	June 30, 2022	September 22, 2022
Dispositive Motions	July 29, 2022	October 31, 2022

Given the court's previous orders granting similar continuances, the court does not expect to grant any further extensions of time unless the requesting party offers a strong and detailed showing of good cause.

**IT IS SO ORDERED.**

Dated: April 15, 2022.

  
CHIEF UNITED STATES DISTRICT JUDGE